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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THE SANKIN FAMILY LLC,

JEANNE SANKIN MARITAL TRUST,

THE JULIUS SANKIN REVOCABLE TRUST,

JEANNE SANKIN, individually and as Trustee of
The Julius Sankin Revocable Trust

IRVING P. COHEN, as the Trustee of the Jeanne

Adv. Pro. No. 10-05391 (SMB)

Sankin Marital Trust and The Julius Sankin
Revocable Trust,

MARILYN S. TUSHMAN, and

ANDREW SANKIN,

Defendants.

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL
OF ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and defendants The Sankin Family LLC, Jeanne Sankin Marital Trust, The Julius Sankin Revocable Trust, Irving P. Cohen, Marilyn S. Tushman, Andrew C. Sankin, and the Estate of Jeanne Sankin (Formerly Jeanne Sankin) (the “Defendants”), by and through its counsel (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On November 12, 2010, the Trustee filed and served the Complaint against the Defendants.
2. On January 22, 2014, Defendants served amended answers on the Trustee.
3. On September 10, 2015, the Parties entered into a settlement agreement pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [No. 08-01789, Dkt. No. 3181].
4. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee’s claims against Defendants in the above-captioned adversary

proceeding and dismissing the adversary proceeding.

5. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: September 10, 2015

BAKER & HOSTETLER LLP

/s/ Marc Hirschfield

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the Estate of Bernard L. Madoff*

**CONROY, SIMBERG, GANON,
KREVANS, ABEL, LURVEY,
MORROW & SCHEFER, P.A.**

By: /s/ Robert S. Horwitz

Robert S. Horwitz

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Attorneys for Defendants

SO ORDERED

/s/ STUART M. BERNSTEIN

HON. STUART M. BERNSTEIN

UNITED STATES BANKRUPTCY JUDGE

Dated: September 11th, 2015
New York, New York